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***Attorneys for Defendants Thomson SA and
Thomson Consumer Electronics, Inc.***

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi,
Ltd., et. al., No. 13-cv-01173*

*Electrograph Systems, Inc. et al. v.
Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA, et al., No. 13-cv-00141;*

*Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;*

*Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;*

**DECLARATION OF STEPHEN M.
JUDGE IN SUPPORT OF THOMSON
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL AND
OBJECTIONS TO SPECIAL MASTER'S
RECOMMENDED ORDER RE
THOMSON DEFENDANT'S MOTIONS
TO COMPEL DISCOVERY RESPONSES
FROM DAPs**

Judge: Hon. Samuel Conti

Costco Wholesale Corporation v. Technicolor SA, et al., No. 13-cv-05723;

P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al., No. 31:cv-05725;

Schultze Agency Services, LLC, o/b/o Tweeter Opco, LLC, et al. v. Technicolor SA, Ltd., et al., No. 13-cv-05668;

Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, No. 3:13-cv-05262;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

Tech Data Corp., et al. v. Hitachi, Ltd., et al., No. 13-cv-00157;

ViewSonic Corporation, v. Chunghwa Picture Tubes, Ltd., et al., 3:14cv-02510.

I, Stephen M. Judge, hereby declare as follows:

1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel for Defendants, Technicolor SA (f/k/a Thomson SA) and Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.) (together “Thomson Defendants”). I am admitted to practice *pro hac vice* before the United States District Court for the Northern District of California. I make this declaration in support of the Thomson Defendants’ Administrative Motion to Filed Under Seal its Objections to the Special Master’s December 24, 2014 Recommended Order Regarding the Thomson Defendants’ Motions to Compel (“Objections”). The statements contained in this declaration are based on my personal knowledge and, if called as a witness, I could competently testify to the following facts.

2. Attached hereto as Exhibit 1 is a true and correct copy of Motion to Compel Interrogatory Responses and Document Production, which was submitted to the Special Master

1 for Discovery on September 12, 2014 (“September 12 Motion”). The highlighted portions of
2 Exhibit 1 discuss or reference the designated portions of Exhibit 2, discussed below.

3 3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of J.
4 Roberts and exhibits in Support of the September 12 Motion, which were submitted to the Special
5 Master for Discovery on September 12, 2014. Pages 311 to 341 of Exhibit 2 include the
6 following documents that have been designated as “Confidential” or “Highly Confidential” under
7 the terms of the Stipulated Protective Order entered in this case (No. 07-cv-05944, Dkt. No. 306,
8 amended at Dkt. No. 1142):

- 9 a. May 22, 2014, Deposition of Brian R. Stone, as 30(b)(6) designee of Best
10 Buy (Designated “Highly Confidential”).
11 b. June 4, 2014, Deposition of Geoffrey Shavey, as 30(b)(6) designee of
12 Costco Wholesale Corporation. (Designated “Highly Confidential”).
13 c. July 18, 2014, Deposition of James A. Smith, as 30(b)(6) designee of
14 Kmart Corporation. (Designated “Highly Confidential”).

15 4. Attached hereto as Exhibit 3 is a true and correct copy of Motion to Compel
16 Interrogatory Responses and Document Production, which was submitted to the Special Master
17 for Discovery on September 19, 2014 (“September 19 Motion”). The highlighted portions of
18 Exhibit 3 discuss or reference the designated portions of Exhibit 4, discussed below.

19 5. Attached hereto as Exhibit 4 is a true and correct copy of the Declaration of S.
20 Judge and exhibits in Support of the September 19 Motion, which were submitted to the Special
21 Master for Discovery on September 19, 2014. Pages 154 to 155 of Exhibit 4 include a document
22 produced by the Best Buy Plaintiffs with Bates Number BBYCRT124789, which has been
23 designated as “Confidential” under the terms of the Stipulated Protective Order entered in this
24 case (No. 07-cv-05944, Dkt. No. 306, amended at Dkt. No. 1142).

25 6. Attached hereto as Exhibit 5 is a true and correct copy of DAPs’ Response to
26 Thomson Defendants’ Motions to Compel, which was submitted to the Special Master for
27 Discovery on October 3, 2014 (“DAPs’ Response”).
28

9. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (Dkt. No. 306).

11. The Thomson Defendants seek to submit these documents under seal in good faith in order to comply with the Stipulated Protective Order and this Court's Local Rules.

/s/ Stephen M. Judge